

STEPHEN P. SONNENBERG
GLENN S. GRINDLINGER
ALISON R. KIRSHNER
PAUL, HASTINGS, JANOFSKY & WALKER LLP
75 East 55th Street
New York, New York 10022
(212) 318-6000

Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES BONOMO,

Plaintiff,

- against -

MITSUBISHI INTERNATIONAL
CORPORATION,

Defendant.

07 Civ. 5967 (CM)

Affirmation of
Stephen P. Sonnenberg

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Stephen P. Sonnenberg, being duly sworn, deposes and says:

1. I am a partner with the law firm of Paul, Hastings, Janofsky, and Walker LLP, counsel for Defendant Mitsubishi International Corporation. I submit this affirmation in support of Defendant's Memorandum of Law in Opposition to Plaintiff's Motion for Sanctions.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the deposition of Plaintiff James Bonomo, taken on November 9, 2007.

3. Attached hereto as Exhibit B is a true and correct copy of a letter from Jeffrey L. Liddle to Frederic C. Leffler, dated May 24, 2007.

4. Attached hereto as Exhibit C is a true and correct copy of a letter from Christine A. Palmieri to Frederic C. Leffler, dated May 24, 2007.

5. Attached hereto as Exhibit D is a true and correct copy of Richard Lovell's typewritten notes from his April 23, 2007 interview with Tetsuya Furuichi, bearing Bates numbered DEF0008787 - DEF0008788.

6. Attached hereto as Exhibit E is a true and correct copy of Richard Lovell's typewritten notes from his May 7, 2007 interview with Koji Torao, bearing Bates numbers DEF0008782 - DEF0008783.

7. Attached hereto as Exhibit F is a true and correct copy of Richard Lovell's handwritten notes from his May 7, 2007 interview with Koji Torao, bearing Bates numbers DEF0008924 - DEF0008925.

8. Attached hereto as Exhibit G is a true and correct copy of Richard Lovell's typewritten notes from his May 16, 2007 interview with Yue Zhibo, bearing Bates numbers DEF0008785 - DEF0008786.

9. Attached hereto as Exhibit H is a true and correct copy of Richard Lovell's typewritten notes from his May 18, 2007 interview with Kenzo Takahashi, bearing Bates number DEF0008952.

10. Attached hereto as Exhibit I is a true and correct copy of Richard Lovell's typewritten notes from his June 6, 2007 interview with Tetsuya Furuichi, bearing Bates numbers DEF0008789 - DEF0008791.

11. Attached hereto as Exhibit J is a true and correct copy of Richard Lovell's handwritten notes from his June 6, 2007 interview with Tetsuya Furuichi, bearing Bates numbers DEF0008818 - DEF0008821.

12. Attached hereto as Exhibit K is a true and correct copy of Richard Lovell's Investigative Findings, dated June 12, 2007, bearing Bates numbers DEF0009055 - DEF0009064.

13. Attached hereto as Exhibit L is a true and correct copy of correspondence between Frederic C. Leffler, and Jeffrey L. Liddle and/or Christine A. Palmieri dated May and June 2007.

14. Attached hereto as Exhibit M is a true and correct copy of excerpts from the deposition of Richard Lovell, taken on May 13, 2008.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
June 24, 2008

/s/ Stephen P. Sonnenberg
STEPHEN P. SONNENBERG

LEGAL_US_E # 79879554.2